

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	[PROPOSED] REVISED CASE
CORRECTIONS CORPORATION OF )	MANAGEMENT ORDER
AMERICA, et al., )	
Defendants. )	
_____ )	

Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), and Defendants CoreCivic, Inc., formerly known as Corrections Corporation of America (“CoreCivic” or the “Company”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin (collectively, “Defendants”) submit the following [Proposed] Revised Case Management Order.

On April 18, 2019, the Court issued a Memorandum and Order staying all discovery aside from outstanding third-party discovery for 60 days in light of Defendants’ then-pending Federal Rule of Civil Procedure 23(f) petition. ECF No. 169. The Court extended the stay twice while the United States Court of Appeals for the Sixth Circuit considered Defendants’ petition. ECF Nos. 171, 173.

On August 23, 2019, the United States Court of Appeals for the Sixth Circuit issued an Order denying Defendants’ Federal Rule of Civil Procedures 23(f) petition. ECF No. 174. Pursuant to the Court’s July 26, 2019 Order, the stay will expire on August 30, 2019. ECF No. 173.

Because the pretrial schedule set forth in the February 15, 2018 Initial Case Management Order (ECF No. 88) is now untenable, the parties have met and conferred and have agreed on the following deadlines to govern the remainder of the case:

<b>Matter</b>	<b>Original Date</b>	<b>New Date</b>
Fact Discovery Cutoff	March 29, 2019	April 17, 2020
Deadline to Submit Joint Mediation Report	April 1, 2019	April 20, 2020
Deadline for Filing of Discovery-Related Motions	April 17, 2019	May 8, 2020
The Parties Declare Experts and Produce Expert Reports Pursuant to Fed. R. Civ. P. 26(a)(2)	May 15, 2019	June 12, 2020
• Rebuttal	June 19, 2019	July 24, 2020
• Completion of Expert Depositions	July 31, 2019	September 4, 2020
Dispositive & <i>Daubert</i> Motions		
• Opening Briefs	September 27, 2019	October 16, 2020

<b>Matter</b>	<b>Original Date</b>	<b>New Date</b>
• Oppositions	November 15, 2019	December 18, 2020
• Replies	December 20, 2019	January 22, 2021
Pretrial Conference	April 17, 2020 at 1:30 p.m.	April 16, 2021 at 1:30 p.m.
Trial	April 21, 2020	May 18, 2021

DATED: August 30, 2019

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DATED: August 30, 2019

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 30, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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